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## REMCHO, JOHANSEN & PURCELL, LLP ATTORNEYS AT LAW

201 DOLORES AVENUE
SAN LEANDRO, CA 94577
PHONE (510) 346-6200
FAX (510) 346-6201
E-MAIL harrison@ijp com
WEBSITE www.ijp.com

SACRAMENTO PHONE (916) 264-1818

Joseph Remcho (1944-2003)
Robin B Johansen
Kathleen J Purcell (Ret )
James C Harrison
Thomas A Willis
Karen Getman
Margaret R Prinzing
Kari Krogseng

October 29, 2007

PEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

### VIA FEDERAL EXPRESS

Jeff Jordan
Office of General Counsel
Federal Election Commission
999 "E" Street, NW
Washington, DC 20463

Re MUR 5943 Supplement to Complaint Regarding Possible Violations of the Bipartisan Campaign Reform Act, Request for Referral to Department of Justice

Dear Mr Jordan

We write to provide you additional information in connection with the complaint we filed on behalf of Ursula Angell, a California voter, under 2 U S C section 437g(a)(1), 2 U S C section 437g(a)(5)(C) and 11 C F R section 111 4(a) The respondents to the complaint are Rudy Giuliani, a candidate for the Republican nomination for President, and Paul Singer, a policy adviser and Regional Finance Chair to the Giuliani campaign

Reform Act, a California ballot measure that would change the way California allocates its Presidential Electors, has been revived by individuals with close ties to the Giuliani campaign (Los Angeles Times, "GOP team revives electoral vote initiative," October 23, 2007, Attachment 1) Indeed, the chief fundraiser for the effort is Anne Dunamore Until September 26, 2007, Ms. Dunamore was Mr. Giuliani's Deputy Campaign Manager (Associated Press, "Giuliani's top finance official leaves campaign days before third-quarter fundraising deadline," September 26, 2007, Attachment 2) Although the circumstances of Ms. Dunamore's departure are mysterious, her continued dedication to Mr. Giuliani is not According to press reports, when she left the Giuliani campaign, Ms. Dunamore said "I

Ms Angell's sworn and notarized declaration attesting, on information and belief, to the truth of the facts asserted herein is attached to this letter. Ms Angell may be contacted through our office

Jeff Jordan Federal Election Commission October 29, 2007 Page 2

continue to believe Rudy Gruliam is the strongest candidate in the race and I strongly support him for president " (Associated Press, September 26, 2007, Attachment 2)

In addition to Ms Dunsmore, a political consultant named Ed Rollins has also joined the effort to qualify the Presidential Election Reform Act Mr Rollins was the campaign manager for Bill Simon, the Republican candidate for Governor of California in 2002 (San Diego Union Tribune, "Simon Slips in Photo Debacle, Blunder may be fatal blow to candidate's gubernatorial campaign," October 13, 2002, Attachment 3) Mr Simon is a Co-Chair of Mr Giuliam's campaign in California (Contra Costa Times, "Giuliam tied to electoral bid," October 2, 2007, Attachment 4)

Another member of the team is attorney James V Lacey Mr Lacey incorporated a California public benefit corporation on October 5, 2007, called California Counts, apparently to act as a vehicle for the campaign effort (California Secretary of State, Records for California Counts, Attachment 5) Mr Lacey is a Giuliani contributor, having donated the maximum amount of \$2,300 to Mr Giuliani's primary election bid (FEC Disclosure Report, Attachment 6)

Finally, the Los Angeles Times reported on October 27, 2007, that another individual who is involved in the qualification effort, Tony Andrade, sent an e-mail addressed "Hello Fellow Rudy Supporter" (Los Angeles Times, "Gruham allies keep pushing controversial state initiative," October 27, 2007, Attachment 7) Mr Andrade's e-mail included a link to the petition to qualify the initiative and urges backers to sign it and get 10 other registered voters to do the same (Id) The e-mail suggests that the Giuliam campaign may have provided its e-mail list to Mr Andrade

All of these ties between the Giuliani campaign and the effort to qualify the California electoral vote measure raise questions about whether the Giuliani campaign and its agents are maintaining or controlling a committee that is soliciting and accepting contributions in excess of the federal limits FEC AO 2003-12, FEC AO 2006-04

We request that the Federal Election Commission examine these facts in connection Ms. Angell's request for an investigation. Thank you for your consideration of this matter.

Sincerely.

James C. Harrison / 717

James C Harrison

JH NL Attachments (00043497-1)

cc U S Department of Justice, Public Integrity Section (via Federal Express, w/attachments)

OFFICIAL CALIFORNIA NOTARIAL CERTIFICATE Acknowledgment		
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# DECLARATION UNDER PENALTY OF PERJURY

On information and belief, I declare under penalty of perjury and subject to the provisions of section 1001 of title 18 of the U.S. Code that the facts stated herein are true and correct, and that this declaration was executed in Los Angeles, California on October 29, 2007.

Ursala Angell
Ursala Angell

Los Angeles, CA 90041

NOTARY

Original Document See Attached Acknowledgement

# **ATTACHMENT 1**

TOUNSEL ....



http://www.latimes.com/news/printedition/asection/la-na-electoral23oct23 1,14168 story?ctrack=1&.cset=true
From the Los Angeles Times

## GOP team revives electoral vote initiative

The intent is to change California's winner-take-all system, which would give Republicans an edge in the presidential race. By Dan Morain and Joe Mathews

Los Angeles Times Staff Writers

October 23, 2007

SACRAMENTO — Veteran GOP consultants said Monday that they were relaunching a drive to change the way California allocates its electoral college votes, aimed at helping the 2008 Republican presidential nominee capture the White House

Political strategist David Gilliard said he was taking over the ballot initiative campaign, along with strategist Ed Rollins and fundraiser Anne Dunsmore Consultant Mike Arno will oversee the signature-gathering effort

"Our budget is going to be whatever it takes to make the June ballot," said Gilliard, who played a key role in getting the recall of Democratic Gov Gray Davis onto the 2003 ballot

The proposed mutative would change California's method of allocating its 55 electoral votes from a winner-takeall basis, which favors Democrats, to a congressional district-based approach. Republicans hold 19 congressional seats, so presumably the GOP nominee could win a similar number of electoral votes.

The effort stalled last month when its original organizers failed to raise the \$2 million needed to place the initiative on the June ballot

Until recently, Dunamore oversaw fundraising for Rudolph W Giuham's presidential campaign — prompting Democrats to charge that the former New York mayor was behind the initiative drive A major Giuham benefactor, Wall Street mogul Paul E Singer, donated \$175,000 to fund the original effort

Giuliani's campaign has denied any involvement. Gilliard said he was not associated with any of the presidential campaigns and predicted that donors to all of the major Republicans would chip in for the initiative drive

On Monday, Democrats were gearing up to battle the measure

"Republicans seem to be pursuing a strategy where they will lose at the polls and, along the way, define the GOP as the party of electoral fraudster," said Chris Lehane, a former Clinton White House aide who was organizing the opposition

California Secretary of State Debra Bowen has set Nov 13 as the deadline for submitting signatures to place the measure on the June ballot Backers must gather 434,000 valid signatures of registered voters. Because many signatures are typically deemed invalid, circulators will probably seek at least 650,000. The initial campaign had gathered about 100,000 signatures.

dan morain@latimes com joe mathews@latimes com

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# **ATTACHMENT 2**

FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

## **Associated Press Archive**

**September 27, 2007** 

# Giuliani's top finance official leaves campaign days before third-quarter fundraising deadline

LIBBY QUAID Associated Press Writer

Republican presidential candidate Rudy Giuhani's top finance official is out in a staff shake-up just days before the fundrating deadline for the White House hopefuls

Anne Dunemore, deputy campaign manager for finance, has left the operation. Guliani aides said the departure was unrelated to fundraising. The third-quarter deadline for all campaigns, Republican and Democrat, is Sunday "Anne Dunemore is no longer working on our campaign. We thank Anne for her service and the departure is amicable," Katie Levinson, communications director for the campaign, said Wednesday.

Republican fundraiser Jim Lee will now serve as national co-chair and head the finance operation, with day-to-day responsibility for all fundraising operations

in a statement, Dunamore said. "I continue to believe Rudy Giuliani is the strongest candidate in the race and I strongly support him for president."

Gruisen: aides said Dunsmore left over differences in strategy more than anything else. Dunsmore is based in Los Angeles and headed President Bush's California fundraising in 2000 and 2004.

Giuliani was raising money Wadnesday in New Jersey, at a fundraiser for Somerset County Republicans and at a house party where givers were being asked for \$500 per person. Polls show Giuliani leading the Republican field in New Jersey.

Giuliani said fundraising was strong

"We'll have a very good quarter, probably the best of the Republicans," Giuliani told reporters before the Somerset County event

In the first six months of the year, Gruliani raised more than \$33 million, second to Republican rival Mitt Romney, with more than \$34 million. Both candidates were shead of rival John McCain, who brought in more than \$24 million.

Gruism also addressed criticism over a California house party fundraiser where attendess are being asked for \$9 11 per person, saying the decision to do so was "unfortunate"

"I think they made a mistake," Giuliani said

Earlier in the day, Giuliani met privately with Iraqi President Jalal Talabani and indicated he would keep a U S presence in Iraq for as long as necessary, campaign aides said

The former New York mayor is one of the few GOP candidates who has never been to Iraq. Talabani, in New York for the U.N. General Assembly, provided what Grukani aides described as an optimistic report about progress in the region during the meeting.

Glukani, in turn, emphasized his support for a unified fraq and indicated that he would keep a U.S. presence in that country for as long as necessary, aides said

The Republican front-runner in national polls has long backed the U.S.-led invesion in Iraq as well as this year's troop buildup. He often enswers questions about the war by deferring to military commanders and has waded less into the

specifics of how he would handle the conflict if he were to win the presidency

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**ATTACHMENT 3** 

## The San Diego Umon-Tribune

## October 13, 2002, Sunday

Simon slips in photo debacle, Blunder may be fatal blow to candidate's gubernatorial campaign

BYLINE: John Marehus, STAFF WRITER

**SECTION:** NEWS,Pg A-1

**LENGTH: 1507 words** 

LOS ANGELES — Behind in the polls and short of money, Republican gubernatorial candidate Bill Simon, by most analyses, has no margin for error in his quest to upset Gov Gray Davis

Last week, he committed a colossal blunder, raising fresh doubts in the minds of Republicans — including, apparently, the candidate himself — as to whether the campaign is salvageable

In a moment of high political drama, Simon and law enforce-ment supporters accused Davis of breaking the law by accepting a campaign contribution in his Capitol office Jan 31, 1998, when he was the lieutenant governor running for governor

As proof, they said they had photographs

Sure enough, there was a date-stamped picture of a smiling Davis and Al Angele, then-executive director of the California Organization of Police and Sheriffs, standing in a doorway holding up a \$10,000 check

Trouble is, the doorway was not in the Capitol, it was in the Santa Monica home of builder Bruce Karatz, who hosted a perfectly legal breakfast meeting of Davis supporters on the day in question

"Our goal was to get that picture on the front page of every newspaper in the state," Ed Rollins, a top Simon campaign strategist, wryly acknowledged "Now, we succeeded in that part of the goal, but we would prefer not to have had all of the print around it "

Rollins fell on his sword for his candidate at a here's-how-it-all-happened news conference where he revealed that the spectacular misfire had shaken Simon's confidence that an upset was in the making

"He was so high," Rollins said "He thought we'd had a couple of good weeks, and he said to me, 'We're going to win this thing, we're going to win this thing' And then all of a sudden, because of our ineptitude, he's put back in the position where he thinks he's going to lose "

To most campaign professionals and political analysts, the damage is severe, if not fatal

The debacle could jeopardize Simon's strongest issue. Davis' aggressive pursuit of campaign contributions from special interests and the juxtaposition of a succession of large donations with governmental actions favoring the contributors.

"Every time he talks about fund raising, people are going to snicker," Republican analyst Jack Pitney, a professor of government at Claremont McKenna College, said of Simon

That Simon, a former federal prosecutor, would in effect introduce a smoking gun into evidence without ascertaining that it was a smoking gun undermines an important part of his resume

"If I did the same thing, or my colleagues around the state did the same thing, our jobs would be in jeopardy, our bosses would be subject to not getting re-elected," said Jim Shore, president of the California Prosecutors Association, which has endorsed Davis

The photo flap has also reignited cocktail party chatter about a write-in campaign by former Los Angeles Mayor Richard Riordan, whom Simon upset for the Republican nomination in March Asked about such a candidacy, Riordan offered the tantalizing tease, "Stay tuned " People who have talked to him say Riordan is serious about jumping in, but only if Simon formally withdraws, which he insists he will not do

As for the overall impact of the fiasco on the race for governor, the most optimistic scenario for a Simon win continues to be Davis' unpopularity — polls show most voters would rather have somebody else as governor — and the ever-present anything-can-happen element in politics

Republican strategist Ken Khachigian, a member of former Gov George Deukmejian's inner circle, recalled the 1982 campaign for governor Deukmejian was well behind in the polls less than a month before election day Then campaign manager Bill Roberts was fired for making a racially insensitive remark about Democrat Tom Bradley, then the mayor of Los Angeles who would have been the nation's first elected black governor

"We lost a campaign manager three weeks out and everybody thought it was the end of the world, and it turns out that George Deukmejian won," Khachigian said

He added, however, that the mistake-prone Simon campaign needs to run a "zero-defect" race to have a chance

Nonpartisan public opinion polls show Davis with a lead of between 7 and 12 percentage points. They also show little movement in the race, which favors the incumbent the closer it gets to Election Day on Nov 5

Campaign financial statements filed last week showed Davis going into the final month of the race with \$21.3 million in the bank, compared with Simon's \$4.3 million

Simon's fund raising has been consistently anemic, forcing Simon and other members of his wealthy family to shoulder the vast majority of the load

"The one place where this really killed them is with the donors," one Republican strategist said of the botched accusation. "They were just beginning to develop a sense of confidence that the campaign was getting its act together."

There was talk that President Bush might pay a visit to California as part of a nationwide preelection tour to give a last-minute boost to Republican candidates in close races. That, said a Republican in Washington with close ties to the White House, was "more likely last week than this week."

It could still happen, although the focus wouldn't necessarily be on Simon

"We do have other races out there that we're interested in," the GOP official said in reference to a competitive congressional seat in the Central Valley and the statewide posts below the office of governor

Some Republican financiers in California reportedly have shifted their focus from Simon to the "down-ticket" races in hopes of heading off a statewide Democratic clean sweep

What does it all add up to?

Pitney irritated the Simon camp some weeks ago with the observation that Simon was "circling the drain" following one of the campaign's many missteps. After the photo shenanigans, he updated the assessment. "It leaves things with Simon as a laughingstock, with a campaign in tatters and Davis as a sure winner. He's no longer circling the drain, he is well on his way to the ocean."

Officials of the California Organization of Police and Sheriffs, which makes money selling space on political slate mailers under the catchy acronym COPS, approached the Simon campaign a number of weeks ago claiming to have incriminating photos of Davis

COPS backed Davis four years ago but broke with him after his campaign refused to buy into their slate mailer before the March primary election. Simon did and the group subsequently endorsed him

Although Simon often calls COPS a "respected law enforcement organization," it is not held in high regard in political circles

"I view these slate guys as a notch above pond scum," Khachigian said "It's legalized extortion They come to you They hit up the highest bidder They're political whores "

Simon and his campaign officials said that because of the multitude of controversies surrounding Davis' voracious fund raising, they found COPS' accusation of illegality to be plausible — so plausible, it turned out, that nobody verified the authenticity of the photos

Simon strategist Rollins said he and other officials only got a brief glimpse at the photos before Simon sprang the allegation at the debate with Davis on Monday

The plan — which Simon campaign officials since acknowledge was "too clever by half" given the inexperience of their candidate — was to have Simon ask Davis if he had ever accepted a campaign check in a government office and let it go at that Then COPS would file an ostensibly independent complaint with the state Fair Political Practices Commission and Simon would pounce on it as further evidence of Davis' corruption

But Simon, not advort at news conferences under the best of conditions, became flustered at the persistent post-debate questioning from probably the largest media contingency he had ever faced. He blurted out that he had "evidence" that Davis broke the law and from that point forward his campaign's fingerprints were all over the allegation.

As soon as COPS executive director Monty Holden unveiled the photos at a Tuesday morning news conference, questions were raised about their validity. Reporters visited the lieutenant governor's Capitol office and found it looked nothing like the setting in the photos. The next day, Karatz issued a statement that the photos were taken at his former residence.

Simon attempted to close the book on the embarrassing incident by issuing a not-quite apology during a speech Thursday to the Town Hall of Los Angeles

"I find it necessary to express to everyone my sincere regret for the way this was handled," he said

Davis was not satisfied, calling the episode "unforgivable"

"The least he could do is express an apology to me," Davis said after a health-care speech in Los Angeles on Friday "You do not accuse a sitting governor of committing a crime unless you have all the facts "

John Marelius (619) 718-5007, john marelius@uniontrib.com



ATTACHMENT 4

# **CONTRACOSTATIMES**

# Giuliani tied to GOP electoral bid

Democratic group says Republican helped to solicit illegal fund for ballot messure

By Steven Harmon

MEDIANENE SACRAMENTO BUREAU

Article Launched 10/02/2007 03 02 16 AM PDT

By Steven Harmon

#### **MEDIANEWS SACRAMENTO BUREAU**

SACRAMENTO — A Democratic group on Monday filed formal compliants with the Federal Election Commission and the U.S. Department of Justice, eccusing Republican presidential candidate Rudy Gutters of violating company laws, including money leundering

The complaints, made by Californians for Fair Election Reform, accuse Gullians, through his friend Paul Singer, of establishing a Missouri "front" organization to solioit illegal donations to support a ballot measure that would overturn California's winner-take-all system of allocating electoral votes

Such a change would provide the Republican precidential nominee a chance to pick up roughly 20 electoral votes by dividing them up by congressional districts

Singer, a hedge-fund billioneire and a policy advisor and regional finance director for Guitani,

revealed last week that he was the sole contributor to the committee, Take industrie America, which donated \$175,000 to the ballot measure

Singer's disclosure that he'd contributed to the group came a day after top compaign officials for the GOP-backed electoral instative — GOP attorney Tom Hiltschik, spoksemen Kevin Eckery and fundraser Marty Wilson — resigned in protect after the lawyer in charge of Take Instative America, Charles Hurth III, refused to disclose who contributed to the committee

Although the mitiative effort appears dead — in part because funding never materialized beyond Singer's contribution — the alleged violations are senicus, earl Chris Lehane, spokesman for the Democratic group

"We want to get to the bottom of this," he said at a San Francisco news conference

Singer's contribution, said James Harrison, the attorney who filed the complaint, resess questions about potential money laundering, slegal coordination between a candidate and an independent committee, and whether federal contribution limits were exceeded.

"As an agent of Guisen's, Singer would be prohibited from soliciting or directing a contribution in excess of \$2,300," seed Harmson, who works with Sen Leendro-based Remoto, Johansen & Purcell, a firm specializing in election law "We'd little the FEC to determine what Guisent knew, when he knew it, what conversations he and Singer had about the contribution and how TIA was created. Whose idea was it? How did it come about?"

A spokeemen for Guiters denied any coordination with the instative effort — the Campaign for Equal

# CONTRA COSTATIMES

Representation — or the Take Initiative America committee

"This is completely independent from our compaign," said Jerrod Agen, "and frenkly it's not an indicative that convex our compaign's best inferests."

Democrats also accused the Guiters campaign of trying to conceal Singer's identity

Under California law, the Campaign for Equal Representation was required to disclose as true source of funding. It identified Take Instative America, which was created Sept. 11, but Hurth, the lawyer behind the committee, refused to disclose where the \$175,000 came from

"We know that Singer intended his money to be used for the effort in California," Hemson said, "so, clearly, TIA was nothing more than a pass through

"In California, that's considered money leundaring "

Lehane said he's convinced Galleni's compaign was behind the effort. He noted that Charles Bell, a partner with Hillschit's firm, gave \$1,300 to Galleni's compaign days before the initiative was filed, Hurth had given \$2,000 to Galleni, his spokermen, Joneshan Wilcox, was a spokermen for former California GOP candidate Bill Simon, Simon himself is a co-cheir for Galleni's California compaign and a policy adviser.

"When you went through all these folks, writelly every road ultimately led back to Gulians, "Lehane said "The one conclusion that one could agfely draw is that it was the Gulians campaign that was ultimately behind this "

Guitani, in a statement last week, said he would have had no reason to be behind the injustive

"As far as i'm concerned, you can leave it the way it is," he said "In fact, in some ways you might consider, I think that this is a state I can win 'That might actually favor some of the other Republican candidates who might have a more difficult time winning this state I think this is a state that I've got a 50-50 chance of winning. So as far as I'm concerned, I wouldn't mind leaving it that way."

Reach Staven Harmon at 916-441-2101 or sharmon@bayareenewagroup com

# **ATTACHMENT 5**

COUNSEL OF SO

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OFFICE OF GENERAL COUNSEL

**ATTACHMENT 7** 



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# TOP OF THE TICKET

< Let's play 'Jeopardy' | Main | Dissecting the numbers >

Giuliani allies keep pushing controversial state initiative

With friends like Rudy Gruken; has in California, his enemies don't need to go out of their way to cause him headeches with federal election officials

We have noted before that one of the main bankrollers for Giukani's presidential campaign, Paul Singer, heavily financed the initial push to get on the state's ballot an indiative that could help a Republican win the White House next year Also, Anne Dunamore, who until September was Guitant's deputy campaign manager in charge for fundraising, recently took over money chores for the ballot measure

Finday, the Gallieni link to the instative grew stronger. A key backer of the measure to after California's winner-take-all system of awarding electoral votes sent an e-mail urging Guitant backers to sign patritions to place it on the ballot

The maske, obtained by The Times' Dan Morain, is addressed, "Helio Fellow Rudy Supporter!" Its author, Tony Andrede, is a Republican activist who helped draft the electoral college initiative. Previously, he was among those who helped place the ultimately successful recall of Gov. Gray Davis on the ballot in 2003.

Democrats betting the electoral college measure already have filed complaints with the Federal Election Commission and U.S. Justice Department alleging the Gruheni campaign. as behind the industrie. If true,

that would be a violation of federal election law, which prohibits such coordination

Chris Lehane, a Democratic activist who is organizing the campaign to block the measure, said of the Andrade e-mail "It sounds like something that the Federal Election Commission and Department of Justice will be very interested in seeing "

Maria Comella, spokeswornen for Giukani's White House bid, previously has stressed that neither he nor his campaign has had anything to do with pushing the ballot initiative

While some of the politices working on the initiative have acknowledged that they back Gluhani, they also have stressed that they are not an official part of his campaign. Thus, they are free to get involved in any side campaign, including the California initiative

Andrade did not respond to requests for comment Friday about the e-mail in which he



### Our Bloggers

Don Frederick h en editor heloma coverage of ever election since 19 third-generation Weshingtonian, & the political work naturally to him

A graduate of No. University, he we for newspapers is before joining the Exammer in 198. has worked in its perch providing t impeachment of response to 9/11 two major parties

Andrew Malcoln perents repeated the importance o participation in a Early lessons inc the alphabetical I watching televies national political That childhood e



invokes Galliani's name. But some of his albee in the fight for the ballot measure clearly were uncomfortable with his tactic

Veteran GOP strategrat Ed Rollins, who is overseeing the attempt to put the indistive before voters, distanced himself from Andrada's note

"None of us has anything to do with any [presidential] campaign, we understand the law very, very well," Rolline said. Pledging to try to "make sure that [the 6-mail] gets stomped," Rollins added, "We need to be very sensitive to the fact that people have speculated that this is part of the Giuliani campaign."

Under the proposed impative, California would change its method of allocating its trove of 55 electoral votes from the winner-take-all system -- which, given the state's current political complexion, favors Democrats - to an approach of the outcome of the presidential race in each congressional district. Republicans now hold 19 of the state's House seets, so presumably the GOP nomines could emerge from California with at least some electoral votes

in his e-mail. Andrade quoted Democratic National Committee Charman Howard Dean. who earlier this week held a news conference to issue his latest denunciation of the initiative. Dean, Andrade noted, said there is no way that a Democratican win the White House without capturing all of California's 55 delegates

(Dean examperates somewhat, of course, a Democrat who sweeps states that have been competitive in recent elections could afford to give up a handful of electoral votes from California But obviously, the party doesn't want to do that, especially since virtually every other state uses the winner-take-all system )

Andrade's e-mail included a link to the patition to qualify the initiative and urges backers to sign it and get 10 other registered voters to do the same. The deadline is Nov. 13 to submit 434,000 valid signatures to place the measure before voters in June 2008

- Don Frederick

October 26, 2007 in California, Democratic Politics, Electoral College, Fundraising, Money, Presidential Campaign, Republican Politice | Permelink

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